September 23, 2002

Re: Holsum of Fort Wayne, Inc. MSOP003-15594-00259
TO: Interested Parties / Applicant

FROM: Paul Dubenetzky
Chief, Permits Branch
Office of Air Quality

Notice of Decision: Approval - Effective Immediately

Please be advised that on behalf of the Commissioner of the Department of Environmental Management, I have issued a decision regarding the enclosed matter. Pursuant to IC 13-15-5-3, this permit is effective immediately, unless a petition for stay of effectiveness is filed and granted according to IC 13-15-6-3, and may be revoked or modified in accordance with the provisions of IC 13-15-7-1.

If you wish to challenge this decision, IC 4-21.5-3 and IC 13-15-6-1 require that you file a petition for administrative review. This petition may include a request for stay of effectiveness and must be submitted to the Office of Environmental Adjudication, ISTA Building, 150 W. Market Street, Suite 618, Indianapolis, IN 46204, **within (18) eighteen days of the mailing of this notice**. The filing of a petition for administrative review is complete on the earliest of the following dates that apply to the filing:

(1) the date the document is delivered to the Office of Environmental Adjudication (OEA);
(2) the date of the postmark on the envelope containing the document, if the document is mailed to OEA by U.S. mail; or
(3) the date on which the document is deposited with a private carrier, as shown by receipt issued by the carrier, if the document is sent to the OEA by private carrier.

The petition must include facts demonstrating that you are either the applicant, a person aggrieved or adversely affected by the decision or otherwise entitled to review by law. Please identify the permit, decision, or other order for which you seek review by permit number, name of the applicant, location, date of this notice and all of the following:

(1) the name and address of the person making the request;
(2) the interest of the person making the request;
(3) identification of any persons represented by the person making the request;
(4) the reasons, with particularity, for the request;
(5) the issues, with particularity, proposed for consideration at any hearing; and
(6) identification of the terms and conditions which, in the judgment of the person making the request, would be appropriate in the case in question to satisfy the requirements of the law governing documents of the type issued by the Commissioner.

If you have technical questions regarding the enclosed documents, please contact the Office of Air Quality, Permits Branch at (317) 233-0178. Callers from within Indiana may call toll-free at 1-800-451-6027, ext. 3-0178.

Enclosure

INDIANA DEPARTMENT OF ENVIRONMENTAL MANAGEMENT
We make Indiana a cleaner, healthier place to live.

Frank O'Bannon
Governor

Lori F. Kaplan
Commissioner

100 North Senate Avenue
P. O. Box 6015
Indianapolis, Indiana 46206-6015
(317) 232-8603
(800) 451-6027
www.state.in.us/idem

MINOR SOURCE OPERATING PERMIT
OFFICE OF AIR QUALITY

Holsum of Fort Wayne, Inc.
136 Murray Street
Fort Wayne, Indiana 46803

(herein known as the Permittee) is hereby authorized to operate subject to the conditions contained herein, the emission units described in Section A (Source Summary) of this permit.

Operation Permit No.: MSOP 003-15594-00259	
Issued by: Original Signed by Paul Dubenetzky Paul Dubenetzky, Branch Chief Office of Air Quality	Issuance Date: September 23, 2002 Expiration Date: September 23, 2007

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SECTION A SOURCE SUMMARY

This permit is based on information requested by the Indiana Department of Environmental Management (IDEM), Office of Air Quality (OAQ). The information describing the source contained in conditions A.1 through A.3 is descriptive information and does not constitute enforceable conditions. However, the Permittee should be aware that a physical change or a change in the method of operation that may render this descriptive information obsolete or inaccurate may trigger requirements for the Permittee to obtain additional permits or seek modification of this permit pursuant to 326 IAC 2, or change other applicable requirements presented in the permit application.

A.1 General Information [326 IAC 2-5.1-3(c)] [326 IAC 2-6.1-4(a)]

The Permittee owns and operates a stationary bread bakery.

Authorized Individual:	President
Source Address:	136 Murray Street, Fort Wayne, Indiana 46803
Mailing Address:	P.O. Box 11468, Fort Wayne, Indiana 46858
Phone Number:	(812) 425-4642
SIC Code:	2051
County Location:	Allen
County Status:	Attainment for all criteria pollutants
Source Status:	Minor Source, under PSD Minor Source, Section 112 of the Clean Air Act Not 1 of 28 source categories

A.2 Emissions units and Pollution Control Equipment Summary

This stationary source is approved to operate the following emissions units and pollution control devices:

(a) One (1) natural gas-fired baking oven, with a maximum heat input capacity of 3.742 million British thermal units (MMBtu) per hour and maximum baking rate of 7,500 pounds of bread per hour, constructed in 1964, and exhausting to stacks #1, #2, and #3.

(b) One (1) natural gas-fired boiler, with a maximum heat input capacity of 4.2 million British thermal units (MMBtu) per hour, constructed in 1959, and exhausting to stack #4.

(c) One (1) natural gas-fired boiler, with a maximum heat input capacity of 5.2 million British thermal units (MMBtu) per hour, constructed in 2000, and exhausting to stack #5.

(d) Three (3) flour storage silos, each with a maximum capacity of 360,000 pounds and a maximum throughput rate of 7.5 tons of flour per hour, constructed in 1963, equipped with a pneumatic conveyance system, using filter bags for control, and venting into the building.

(e) Six (6) natural gas-fired space heaters, including the following:

(1) One (1) space heater, with a maximum heat input capacity of 0.22 MMBtu/hr.

(2) Four (4) space heaters, each with a maximum heat input capacity of 0.15 MMBtu/hr.

(3) One (1) space heater, with a maximum heat input capacity of 0.09 MMBtu/hr.

(f) Three (3) natural gas-fired tube heaters, including the following:

(1) One (1) tube heater, with a maximum heat input capacity of 0.25 MMBtu/hr.

(2) Two (2) tube heaters, each with a maximum heat input capacity of 0.12 MMBtu/hr.

(g) Three (3) natural gas-fired furnaces, including the following:

(1) One (1) residential type furnace, with a maximum heat input capacity of 0.113 MMBtu/hr.

(2) One (1) residential type furnace, with a maximum heat input capacity of 0.09 MMBtu/hr.

(3) One (1) furnace, located in the old office building, with a maximum heat input capacity of 0.1 MMBtu/hr.

(h) One (1) closed top cold degreaser, constructed before 1980, and located in the vehicle maintenance shop.

SECTION B GENERAL CONDITIONS

B.1 Permit No Defense [IC 13]

This permit does not relieve the Permittee of the responsibility to comply with the provisions of the Indiana Environmental Management Law (IC 13-11 through 13-20; 13-22 through 13-25; and 13-30), the Air Pollution Control Law (IC 13-17) and the rules promulgated thereunder, as well as other applicable local, state, and federal requirements.

B.2 Definitions

Terms in this permit shall have the definition assigned to such terms in the referenced regulation. In the absence of definitions in the referenced regulation, any applicable definitions found in IC 13-11, 326 IAC 1-2, and 326 IAC 2-1.1-1 shall prevail.

B.3 Effective Date of the Permit [IC13-15-5-3]

Pursuant to IC 13-15-5-3, this permit becomes effective upon its issuance.

B.4 Modification to Permit [326 IAC 2]

All requirements and conditions of this permit shall remain in effect unless modified in a manner consistent with procedures established for modifications of permits pursuant to 326 IAC 2 (Permit Review Rules).

B.5 Minor Source Operating Permit [326 IAC 2-6.1]

(a) The operation permit will be subject to annual operating permit fees pursuant to 326 IAC 2-1.1-7(Fees).

(b) Pursuant to 326 IAC 2-6.1-7, the Permittee shall apply for an operation permit renewal at least ninety (90) days prior to the expiration date established in the validation letter. If IDEM, OAQ, upon receiving a timely and complete permit application, fails to issue or deny the permit renewal prior to the expiration date of this permit, this existing permit shall not expire and all terms and conditions shall continue in effect until the renewal permit has been issued or denied. The operation permit issued shall contain as a minimum the conditions in Section C and Section D of this permit.

B.6 Permit Term [326 IAC 2-6.1-7]

This permit is issued for a fixed term of five (5) years from the original date, as determined in accordance with IC 4-21.5-3-5(f) and IC 13-15-5-3. Subsequent revisions, modifications or amendments of this permit do not affect the expiration

SECTION C SOURCE OPERATION CONDITIONS

Entire Source

C.1 Part 70 Minor Source Status [326 IAC 2-7]

(a) The potential to emit any regulated pollutant from the entire source is less than one hundred (100) tons per twelve (12) consecutive month period;

(b) The potential to emit any individual hazardous air pollutant (HAP) from the entire source is less than ten (10) tons per twelve (12) consecutive month period; and

(c) The potential to emit any combination of HAPs from the entire source is less than twenty-five (25) tons per twelve (12) consecutive month period.

Therefore, the requirements of 326 IAC 2-7 are not applicable. Any change or modification which may increase potential to emit of any of the pollutant to the levels greater than the limits above, shall cause this source to be considered a major source under Part 70 program, and shall require approval from IDEM, OAQ prior to making the change.

C.2 PSD Minor Source Status [326 IAC 2-2] [40 CFR 52.21]

(a) The total source potential to emit of all criteria pollutants is less than 250 tons per year. Therefore the requirements of 326 IAC 2-2 (Prevention of Significant Deterioration) and 40 CFR 52.21 will not apply.

(b) Any change or modification which may increase potential to emit to 250 tons per year from this source, shall cause this source to be considered a major source under PSD, 326 IAC 2-2 and 40 CFR 52.21, and shall require approval from IDEM, OAQ prior to making the change.

C.3 Preventive Maintenance Plan [326 IAC 1-6-3]

(a) If required by specific condition(s) in Section D of this permit, the Permittee shall prepare and maintain Preventive Maintenance Plans (PMP) after issuance of this permit, including the following information on each emissions unit:

(1) Identification of the individual(s) responsible for inspecting, maintaining, and repairing emission control devices;

(2) A description of the items or conditions that will be inspected and the inspection schedule for said items or conditions;

(3) Identification and quantification of the replacement parts that will be maintained in inventory for quick replacement.

(b) The Permittee shall implement the Preventive Maintenance Plans as necessary to ensure that failure to implement the Preventive Maintenance Plan does not cause or contribute to a violation of any limitation on emissions or potential to emit.

(c) PMP's shall be submitted to IDEM, OAQ, upon request and shall be subject to review and approval by IDEM, OAQ. IDEM, OAQ, may require the Permittee to revise its Preventive Maintenance Plan whenever lack of proper maintenance causes or contributes to any violation.

C.4 Permit Revision [326 IAC 2-5.1-3(e)(3)] [326 IAC 2-6.1-6]

(a) The Permittee must comply with the requirements of 326 IAC 2-6.1-6 whenever the Permittee seeks to amend or modify this permit.

(b) Any application requesting an amendment or modification of this permit shall be submitted to:

Indiana Department of Environmental Management
Permits Branch, Office of Air Quality
100 North Senate Avenue, P.O. Box 6015
Indianapolis, Indiana 46206-6015

Any such application should be certified by the "authorized individual" as defined by 326 IAC 2-1.1-1.

(c) The Permittee shall notify the OAQ within thirty (30) calendar days of implementing a notice-only change. [326 IAC 2-6.1-6(d)]

C.5 Inspection and Entry [326 IAC 2-5.1-3(e)(4)(B)] [326 IAC 2-6.1-5(a)(4)]

Upon presentation of proper identification cards, credentials, and other documents as may be required by law, and subject to the Permittee's right under all applicable laws and regulations to assert that the information collected by the agency is confidential and entitled to be treated as such, the Permittee shall allow IDEM, OAQ, U.S. EPA, or an authorized representative to perform the following:

(a) Enter upon the Permittee's premises where a permitted source is located, or emissions related activity is conducted, or where records must be kept under the conditions of this permit;

(b) Have access to and copy, at reasonable times, any records that must be kept under this title or the conditions of this permit or any operating permit revisions;

(c) Inspect, at reasonable times, any processes, emissions units (including monitoring and air pollution control equipment), practices, or operations regulated or required under this permit or any operating permit revisions;

(d) Sample or monitor, at reasonable times, substances or parameters for the purpose of assuring compliance with this permit or applicable requirements; and

(e) Utilize any photographic, recording, testing, monitoring, or other equipment for the purpose of assuring compliance with this permit or applicable requirements.

C.6 Transfer of Ownership or Operation [326 IAC 2-6.1-6(d)(3)]

Pursuant to [326 IAC 2-6.1-6(d)(3)] :

(a) In the event that ownership of this source is changed, the Permittee shall notify IDEM, OAQ, Permits Branch, within thirty (30) days of the change.

(b) The written notification shall be sufficient to transfer the permit to the new owner by an notice-only change pursuant to 326 IAC 2-6.1-6(d)(3).

(c) IDEM, OAQ, shall issue a revised permit.

The notification which shall be submitted by the Permittee does require the certification by the "authorized individual" as defined by 326 IAC 2-1.1-1.

C.7 Permit Revocation [326 IAC 2-1-9]

Pursuant to 326 IAC 2-1-9(a)(Revocation of Permits), this permit to operate may be revoked for any of the following causes:

(a) Violation of any conditions of this permit.

(b) Failure to disclose all the relevant facts, or misrepresentation in obtaining this permit.

(c) Changes in regulatory requirements that mandate either a temporary or permanent reduction of discharge of contaminants. However, the amendment of appropriate sections of this permit shall not require revocation of this permit.

(d) Noncompliance with orders issued pursuant to 326 IAC 1-5 (Episode Alert Levels) to reduce emissions during an air pollution episode.

(e) For any cause which establishes in the judgment of IDEM the fact that continuance of this permit is not consistent with purposes of this article.

C.8 Opacity [326 IAC 5-1]

Pursuant to 326 IAC 5-1-2 (Opacity Limitations), except as provided in 326 IAC 5-1-3 (Temporary Alternative Opacity Limitations), opacity shall meet the following, unless otherwise stated in this permit:

(a) Opacity shall not exceed an average of forty percent (40%) in any one (1) six (6) minute averaging period as determined in 326 IAC 5-1-4.

(b) Opacity shall not exceed sixty percent (60%) for more than a cumulative total of fifteen (15) minutes (sixty (60) readings as measured according to 40 CFR 60, Appendix A, Method 9 or fifteen (15) one (1) minute nonoverlapping integrated averages for a continuous opacity monitor) in a six (6) hour period.

C.9 Fugitive Dust Emissions [326 IAC 6-4]

The Permittee shall not allow fugitive dust to escape beyond the property line or boundaries of the property, right-of-way, or easement on which the source is located, in a manner that would violate 326 IAC 6-4 (Fugitive Dust Emissions). 326 IAC 6-4-2(4) is not federally enforceable.

Testing Requirements

C.10 Performance Testing [326 IAC 3-6]

(a) Compliance testing on new emissions units shall be conducted within 60 days after achieving maximum production rate, but no later than180 days after initial start-up, if specified in Section D of this approval. All testing shall be performed according to the provisions of 326 IAC 3-6 (Source Sampling Procedures), except as provided elsewhere in this permit, utilizing any applicable procedures and analysis methods specified in 40 CFR 51, 40 CFR 60, 40 CFR 61, 40 CFR 63, 40 CFR 75, or other procedures approved by IDEM, OAQ.

A test protocol, except as provided elsewhere in this permit, shall be submitted to:

Indiana Department of Environmental Management
Compliance Data Section, Office of Air Quality
100 North Senate Avenue, P. O. Box 6015
Indianapolis, Indiana 46206-6015

no later than thirty-five (35) days prior to the intended test date. The Permittee shall submit a notice of the actual test date to the above address so that it is received at least two weeks prior to the test date.

(b) All test reports must be received by IDEM, OAQ within forty-five (45) days after the completion of the testing. An extension may be granted by the IDEM, OAQ, if the source submits to IDEM, OAQ, a reasonable written explanation within five (5) days prior to the end of the initial forty-five (45) day period.

The documentation submitted by the Permittee does not require certification by the "authorized individual" as defined by 326 IAC 2-1.1-1.

Compliance Monitoring Requirements

C.11 Monitoring Methods [326 IAC 3]

Any monitoring or testing required by Section D of this permit shall be performed according to the provisions of 326 IAC 3, 40 CFR 60, Appendix A, or other approved methods as specified in this permit.

Record Keeping and Reporting Requirements

C.12 Malfunctions Report [326 IAC 1-6-2]

Pursuant to 326 IAC 1-6-2 (Records; Notice of Malfunction):

(a) A record of all malfunctions, including startups or shutdowns of any facility or emission control equipment, which result in violations of applicable air pollution control regulations or applicable emission limitations shall be kept and retained for a period of three (3) years and shall be made available to the Indiana Department of Environmental Management (IDEM), Office of Air Quality(OAQ) or appointed representative upon request.

(b) When a malfunction of any facility or emission control equipment occurs which lasts more than one (1) hour, said condition shall be reported to OAQ, using the Malfunction Report Forms (2 pages). Notification shall be made by telephone or facsimile, as soon as practicable, but in no event later than four (4) daytime business hours after the beginning of said occurrence.

(c) Failure to report a malfunction of any emission control equipment shall constitute a violation of 326 IAC 1-6, and any other applicable rules. Information of the scope and expected duration of the malfunction shall be provided, including the items specified in 326 IAC 1-6-2(a)(1) through (6).

(d) Malfunction is defined as any sudden, unavoidable failure of any air pollution control equipment, process, or combustion or process equipment to operate in a normal and usual manner. [326 IAC 1-2-39]

C.13 Monitoring Data Availability [326 IAC 2-6.1-2] [IC 13-14-1-13]

(a) With the exception of performance tests conducted in accordance with Section C-Performance Testing, all observations, sampling, maintenance procedures, and record keeping, required as a condition of this permit shall be performed at all times the equipment is operating at normal representative conditions.

(b) As an alternative to the observations, sampling, maintenance procedures, and record keeping of subsection (a) above, when the equipment listed in Section D of this permit is not operating, the Permittee shall either record the fact that the equipment is shut down

or perform the observations, sampling, maintenance procedures, and record keeping that would otherwise be required by this permit.

(c) If the equipment is operating but abnormal conditions prevail, additional observations and sampling should be taken with a record made of the nature of the abnormality.

(d) If for reasons beyond its control, the operator fails to make required observations, sampling, maintenance procedures, or record keeping, reasons for this must be recorded.

(e) At its discretion, IDEM may excuse such failure providing adequate justification is documented and such failures do not exceed five percent (5%) of the operating time in any quarter.

(f) Temporary, unscheduled unavailability of staff qualified to perform the required observations, sampling, maintenance procedures, or record keeping shall be considered a valid reason for failure to perform the requirements stated in (a) above.

C.14 General Record Keeping Requirements [326 IAC 2-6.1-2]

(a) Records of all required monitoring data and support information shall be retained for a period of at least five (5) years from the date of monitoring sample, measurement, report, or application. These records shall be kept at the source location for a minimum of three (3) years and available upon the request of an IDEM, OAQ, representative. The records may be stored elsewhere for the remaining two (2) years as long as they are available upon request. If the Commissioner makes a written request for records to the Permittee, the Permittee shall furnish the records to the Commissioner within a reasonable time.

(b) Records of required monitoring information shall include, where applicable:

(1) The date, place, and time of sampling or measurements;

(2) The dates analyses were performed;

(3) The company or entity performing the analyses;

(4) The analytic techniques or methods used;

(5) The results of such analyses; and

(6) The operating conditions existing at the time of sampling or measurement.

(c) Support information shall include, where applicable:

(1) Copies of all reports required by this permit;

(2) All original strip chart recordings for continuous monitoring instrumentation;

(3) All calibration and maintenance records;

(4) Records of preventive maintenance shall be sufficient to demonstrate that failure to implement the Preventive Maintenance Plan did not cause or contribute to a violation of any limitation on emissions or potential to emit. To be relied upon subsequent to any such violation, these records may include, but are not limited to: work orders, parts inventories, and operator's standard operating procedures. Records of response steps taken shall indicate whether the

response steps were performed in accordance with the Compliance Response Plan required by Section C - Compliance Response Plan - Preparation, Implementation, Records, and Reports, of this permit, and whether a deviation from a permit condition was reported. All records shall briefly describe what maintenance and response steps were taken and indicate who performed the tasks.

(d) All record keeping requirements not already legally required shall be implemented when operation begins.

C.15 General Reporting Requirements [326 IAC 2-1.1-11] [326 IAC 2-6.1-2] [IC 13-14-1-13]

(a) Reports required by conditions in Section D of this permit shall be submitted to:

Indiana Department of Environmental Management
Compliance Data Section, Office of Air Quality
100 North Senate Avenue, P. O. Box 6015
Indianapolis, Indiana 46206-6015

(b) Unless otherwise specified in this permit, any notice, report, or other submission required by this permit shall be considered timely if the date postmarked on the envelope or certified mail receipt, or affixed by the shipper on the private shipping receipt, is on or before the date it is due. If the document is submitted by any other means, it shall be considered timely if received by IDEM, OAQ, on or before the date it is due.

(c) The first report shall cover the period commencing on the date of issuance of this permit and ending on the last day of the reporting period.

C.16 Annual Notification [326 IAC 2-6.1-5(a)(5)]

(a) Annual notification shall be submitted to the Office of Air Quality stating whether or not the source is in operation and in compliance with the terms and conditions contained in this permit.

(b) Noncompliance with any condition must be specifically identified. If there are any permit conditions or requirements for which the source is not in compliance at any time during the year, the Permittee must provide a narrative description of how the source did or will achieve compliance and the date compliance was, or will be, achieved. The notification must be signed by an authorized individual.

(c) The annual notice shall cover the time period from January 1 to December 31 of the previous year, and shall be submitted in the format attached no later than March 1 of each year to:

Compliance Branch, Office of Air Quality
Indiana Department of Environmental Management
100 North Senate Avenue, P.O. Box 6015
Indianapolis, IN 46206-6015

(d) The notification shall be considered timely if the date postmarked on the envelope or certified mail receipt, or affixed by the shipper on the private shipping receipt, is on or before the date it is due. If the document is submitted by any other means, it shall be considered timely if received by IDEM, OAQ, on or before the date it is due.

SECTION D.1 EMISSIONS UNIT OPERATION CONDITIONS

Facility Description [326 IAC 2-6.1]:

(a) One (1) natural gas-fired baking oven, with a maximum heat input capacity of 3.742 million British thermal units (MMBtu) per hour and maximum baking rate of 7,500 pounds of bread per hour, constructed in 1964, and exhausting to stacks #1, #2, and #3.

(The information describing the process contained in this facility description box is descriptive information and does not constitute enforceable conditions.)

Emission Limitations and Standards [326 IAC 2-6.1]

D.1.1 Particulate Matter (PM) [326 IAC 6-3-2]

Pursuant to 326 IAC 6-3-2(c) (Process Operations), the allowable PM emission rate from the bread baking oven shall not exceed 9.94 pounds per hour when operating at a process weight rate of 7,500 pounds per hour.

The pounds per hour limitation was calculated with the following equation:

Interpolation of the data for the process weight rate up to sixty thousand (60,000) pounds per hour shall be accomplished by use of the equation:

$E = 4.10\ P^{0.67}$ where E = rate of emission in pounds per hour; and P = process weight rate in tons per hour

D.1.2 Preventive Maintenance Plan [326 IAC 1-6-3]

A Preventive Maintenance Plan, in accordance with Section C - Preventive Maintenance Plan, of this permit, is required for this facility and its control device.

SECTION D.2 EMISSIONS UNIT OPERATION CONDITIONS

Facility Description [326 IAC 2-6.1]:

(b) One (1) natural gas-fired boiler, with a maximum heat input capacity of 4.2 million British thermal units (MMBtu) per hour, constructed in 1959, and exhausting to stack #4.

(c) One (1) natural gas-fired boiler, with a maximum heat input capacity of 5.2 million British thermal units (MMBtu) per hour, constructed in 2000, and exhausting to stack #5.

(The information describing the process contained in this facility description box is descriptive information and does not constitute enforceable conditions.)

Emission Limitations and Standards [326 IAC 2-6.1]

D.2.1 Particulate Matter (PM) [326 IAC 6-2-3]

Pursuant to 326 IAC 6-2-3 (d) (Particulate emission limitations for sources of indirect heating: emission limitations for facilities specified in 326 IAC 6-2-1 (b)), particulate emissions from the 4.2 MMBtu/hr boiler, which was existing and in operation before June 8, 1972, shall in no case exceed 0.8 pounds of particulate matter per million British thermal units heat input.

D.2.2 Particulate Matter (PM) [326 IAC 6-2-4]

Pursuant to 326 IAC 6-2-4 (Particulate emission limitations for sources of indirect heating: emission limitations for facilities specified in 326 IAC 6-2-1 (b)), particulate emissions from the 5.2 MMBtu/hr boiler, which was constructed after September 12, 1983, shall in no case exceed 0.6 pounds of particulate matter per million British thermal units heat input.

SECTION D.3 EMISSIONS UNIT OPERATION CONDITIONS

Facility Description [326 IAC 2-6.1]:

(d) Three (3) flour storage silos, each with a maximum capacity of 360,000 pounds and a maximum throughput rate of 7.5 tons of flour per hour, constructed in 1963, equipped with a pneumatic conveyance system, using filter bags for control, and venting into the building.

(The information describing the process contained in this facility description box is descriptive information and does not constitute enforceable conditions.)

Emission Limitations and Standards [326 IAC 2-6.1]

D.3.1 Particulate Matter (PM) [326 IAC 6-3-2]

Pursuant to 326 IAC 6-3-2(c) (Process Operations), the allowable PM emission rate from each storage silo shall not exceed 15.8 pounds per hour when operating at a process weight rate of 15,000 pounds per hour.

The pounds per hour limitation was calculated with the following equation:

Interpolation of the data for the process weight rate up to sixty thousand (60,000) pounds per hour shall be accomplished by use of the equation:

$E = 4.10\ P^{0.67}$ where E = rate of emission in pounds per hour; and P = process weight rate in tons per hour

Compliance Determination Requirements [326 IAC 2-5.1-3(e)(2)] [326 IAC 2-6.1-5(a)(2)]

D.3.2 PM Emissions

Pursuant to permit #003-6247-00259, issued on August 4, 1997 and in order to comply with Conditions D.3.1, the dry filters used to control PM emissions from the silos shall be in operation at all times when these storage silos are in operation.

SECTION D.4 EMISSIONS UNIT OPERATION CONDITIONS

Facility Description [326 IAC 2-6.1]:

(e) Six (6) natural gas-fired space heaters, including the following:

(1) One (1) space heater, with a maximum heat input capacity of 0.22 MMBtu/hr.

(2) Four (4) space heaters, each with a maximum heat input capacity of 0.15 MMBtu/hr.

(3) One (1) space heater, with a maximum heat input capacity of 0.09 MMBtu/hr.

(f) Three (3) natural gas-fired tube heaters, including the following:

(1) One (1) tube heater, with a maximum heat input capacity of 0.25 MMBtu/hr.

(2) Two (2) tube heaters, each with a maximum heat input capacity of 0.12 MMBtu/hr.

(g) Three (3) natural gas-fired furnaces, including the following:

(1) One (1) residential type furnace, with a maximum heat input capacity of 0.113 MMBtu/hr.

(2) One (1) residential type furnace, with a maximum heat input capacity of 0.09 MMBtu/hr.

(3) One (1) furnace, located in the old office building, with a maximum heat input capacity of 0.1 MMBtu/hr.

(h) One (1) closed top cold degreaser, constructed before 1980, and located in the vehicle maintenance shop.

(The information describing the process contained in this facility description box is descriptive information and does not constitute enforceable conditions.)

Emission Limitations and Standards [326 IAC 2-6.1]

There are no specifically applicable requirements that apply to these emission units.

INDIANA DEPARTMENT OF ENVIRONMENTAL MANAGEMENT
OFFICE OF AIR QUALITY
Compliance Branch

MINOR SOURCE OPERATING PERMIT
ANNUAL NOTIFICATION

This form should be used to comply with the notification requirements under 326 IAC 2-6.1-5(a)(5).

Company Name:	**Holsom of Fort Wayne, Inc.**
Address:	**136 Murray Street**
City:	**Fort Wayne, Indiana 46803**
Phone #:	**(812) 425-4642**
MSOP #:	**003-15594-00259**

I hereby certify that Holsom of Fort Wayne, Inc. is
9 still in operation.
9 no longer in operation.

I hereby certify that Holsom of Fort Wayne, Inc. is
9 in compliance with the requirements of MSOP 003-15594-00259.
9 not in compliance with the requirements of MSOP 003-15594-00259.

Authorized Individual (typed):
Title:
Signature:
Date:

If there are any conditions or requirements for which the source is not in compliance, provide a narrative description of how the source did or will achieve compliance and the date compliance was, or will be achieved.

Noncompliance:

MALFUNCTION REPORT

INDIANA DEPARTMENT OF ENVIRONMENTAL MANAGEMENT
OFFICE OF AIR QUALITY
FAX NUMBER - 317 233-5967

This form should only be used to report malfunctions applicable to Rule 326 IAC 1-6 and to qualify for the exemption under 326 IAC 1-6-4.

THIS FACILITY MEETS THE APPLICABILITY REQUIREMENTS BECAUSE IT HAS POTENTIAL TO EMIT 25 TONS/YEAR PARTICULATE MATTER ?_____, 25 TONS/YEAR SULFUR DIOXIDE ?_____, 25 TONS/YEAR NITROGEN OXIDES?_____, 25 TONS/YEAR VOC ?_____, 25 TONS/YEAR HYDROGEN SULFIDE ?_____, 25 TONS/YEAR TOTAL REDUCED SULFUR ?_____, 25 TONS/YEAR REDUCED SULFUR COMPOUNDS ?_____, 25 TONS/YEAR FLUORIDES ?_____, 100TONS/YEAR CARBON MONOXIDE ?_____, 10 TONS/YEAR ANY SINGLE HAZARDOUS AIR POLLUTANT ?_____, 25 TONS/YEAR ANY COMBINATION HAZARDOUS AIR POLLUTANT ?_____, 1 TON/YEAR LEAD OR LEAD COMPOUNDS MEASURED AS ELEMENTAL LEAD ?_____, OR IS A SOURCE LISTED UNDER 326 IAC 2-5.1-3(2) ?_____. EMISSIONS FROM MALFUNCTIONING CONTROL EQUIPMENT OR PROCESS EQUIPMENT CAUSED EMISSIONS IN EXCESS OF APPLICABLE LIMITATION _____.

THIS MALFUNCTION RESULTED IN A VIOLATION OF: 326 IAC _____ OR, PERMIT CONDITION # _____ AND/OR PERMIT LIMIT OF _____

THIS INCIDENT MEETS THE DEFINITION OF 'MALFUNCTION' AS LISTED ON REVERSE SIDE ? Y N

THIS MALFUNCTION IS OR WILL BE LONGER THAN THE ONE (1) HOUR REPORTING REQUIREMENT ? Y N

COMPANY:_____PHONE NO. ( )_____
LOCATION: (CITY AND COUNTY)_____
PERMIT NO. _____ AFS PLANT ID: _____ AFS POINT ID: _____ INSP:_____
CONTROL/PROCESS DEVICE WHICH MALFUNCTIONED AND REASON:_____
_____

DATE/TIME MALFUNCTION STARTED: _____/_____/ 20____ _____ AM / PM

ESTIMATED HOURS OF OPERATION WITH MALFUNCTION CONDITION:
_____

DATE/TIME CONTROL EQUIPMENT BACK-IN SERVICE_____/_____/ 20____ _____ AM/PM

TYPE OF POLLUTANTS EMITTED: TSP, PM-10, SO2, VOC, OTHER:_____

ESTIMATED AMOUNT OF POLLUTANT EMITTED DURING MALFUNCTION: _____

_____

MEASURES TAKEN TO MINIMIZE EMISSIONS:_____

_____

REASONS WHY FACILITY CANNOT BE SHUTDOWN DURING REPAIRS:

CONTINUED OPERATION REQUIRED TO PROVIDE ESSENTIAL* SERVICES:_____
CONTINUED OPERATION NECESSARY TO PREVENT INJURY TO PERSONS:_____
CONTINUED OPERATION NECESSARY TO PREVENT SEVERE DAMAGE TO EQUIPMENT:_____
INTERIM CONTROL MEASURES: (IF APPLICABLE)_____
_____
_____

MALFUNCTION REPORTED BY:_____TITLE:_____
(SIGNATURE IF FAXED)

MALFUNCTION RECORDED BY:_____DATE:_____TIME:_____
*SEE PAGE 2

Please note - This form should only be used to report malfunctions applicable to Rule 326 IAC 1-6 and to qualify for the exemption under 326 IAC 1-6-4.

326 IAC 1-6-1 Applicability of rule

Sec. 1. This rule applies to the owner or operator of any facility required to obtain a permit under 326 IAC 2-5.1 or 326 IAC 2-6.1.

326 IAC 1-2-39 "Malfunction" definition

Sec. 39. Any sudden, unavoidable failure of any air pollution control equipment, process, or combustion or process equipment to operate in a normal and usual manner.

***Essential services** are interpreted to mean those operations, such as, the providing of electricity by power plants. Continued operation solely for the economic benefit of the owner or operator shall not be sufficient reason why a facility cannot be shutdown during a control equipment shutdown.

If this item is checked on the front, please explain rationale:

_____

_____

Indiana Department of Environmental Management
Office of Air Quality

Technical Support Document (TSD) for a Minor Source Operating Permit

Source Background and Description

Source Name:	Holsum of Fort Wayne, Inc.
Source Location:	136 Murray Street, Fort Wayne, Indiana 46803
County:	Allen
SIC Code:	2051
Operation Permit No.:	003-15594-00259
Permit Reviewer:	ERG/YC

The Office of Air Quality (OAQ) has reviewed an application from Holsum of Fort Wayne, Inc. relating to the operation of a bread bakery.

Permitted Emission Units and Pollution Control Equipment

The source consists of the following permitted emission units and pollution control devices:

(a) One (1) natural gas-fired baking oven, with a maximum heat input capacity of 3.742 million British thermal units (MMBtu) per hour and maximum baking rate of 7,500 pounds of bread per hour, constructed in 1964, and exhausting to stacks #1, #2, and #3.

(b) One (1) natural gas-fired boiler, with a maximum heat input capacity of 4.2 million British thermal units (MMBtu) per hour, constructed in 1959, and exhausting to stack #4.

(c) One (1) natural gas-fired boiler, with a maximum heat input capacity of 5.2 million British thermal units (MMBtu) per hour, constructed in 2000, and exhausting to stack #5.

(d) Three (3) flour storage silos, each with a maximum capacity of 360,000 pounds and a maximum throughput rate of 7.5 tons of flour per hour, constructed in 1963, equipped with a pneumatic conveyance system, using filter bags for control, and venting into the building.

(e) Six (6) natural gas-fired space heaters, including the following:

(1) One (1) space heater, with a maximum heat input capacity of 0.22 MMBtu/hr.

(2) Four (4) space heaters, each with a maximum heat input capacity of 0.15 MMBtu/hr.

(3) One (1) space heater, with a maximum heat input capacity of 0.09 MMBtu/hr.

(f) Three (3) natural gas-fired tube heaters, including the following:

(1) One (1) tube heater, with a maximum heat input capacity of 0.25 MMBtu/hr.

(2) Two (2) tube heaters, each with a maximum heat input capacity of 0.12 MMBtu/hr.

(g) Three (3) natural gas-fired furnaces, including the following:

(1) One (1) residential type furnace, with a maximum heat input capacity of 0.113 MMBtu/hr.

(2) One (1) residential type furnace, with a maximum heat input capacity of 0.09 MMBtu/hr.

(3) One (1) furnace, located in the old office building, with a maximum heat input capacity of 0.1 MMBtu/hr.

(h) One (1) closed top cold degreaser, constructed before 1980, and located in the vehicle maintenance shop.

Unpermitted Emission Units and Pollution Control Equipment

There are no unpermitted facilities operating at this source during this review process.

New Emission Units and Pollution Control Equipment Receiving Prior Approval

There are no new construction activities included in this permit.

Existing Approvals

The source has been operating under previous approvals including, but not limited to, the following:

(a) OP 003-6247-00259, issued on August 4, 1997; and

(b) Exemption 003-14217-00259, issued on July 3, 2001.

All conditions from previous approvals were incorporated into this permit.

Enforcement Issue

There are no enforcement actions pending.

Stack Summary

Stack ID	Operation	Height (feet)	Diameter (feet)	Flow Rate (acfm)	Temperature (^{0}F)
#1	Oven	49	1	Unknown	210
#2	Oven	41	1	Unknown	315
#3	Oven	41	1	Unknown	280
#5	4.2 MMBtu/hr Boiler	35	1	Unknown	275
#6	5.2 MMBtu/hr Boiler	35	1	69,373	320

Recommendation

The staff recommends to the Commissioner that the operation be approved. This recommendation is based on the following facts and conditions:

Unless otherwise stated, information used in this review was derived from the application and additional information submitted by the applicant.

An application for the purposes of this review was received on May 6, 2002, with additional information received on June 21, 2002.

Emission Calculations

See Appendix A of this document for detailed emissions calculations (pages 1 through 5).

Potential To Emit Before Controls

Pursuant to 326 IAC 2-1.1-1(16), Potential to Emit is defined as "the maximum capacity of a stationary source or emissions unit to emit any air pollutant under its physical and operational design. Any physical or operational limitation on the capacity of a source to emit an air pollutant, including air pollution control equipment and restrictions on hours of operation or type or amount of material combusted, stored, or processed shall be treated as part of its design if the limitation is enforceable by the U. S. EPA, the department, or the appropriate local air pollution control agency."

Pollutant	Potential To Emit (tons/year)
PM	3.94
PM-10	3.94
SO_2	0.04
VOC	67.1
CO	5.47
NO_x	6.51

HAP's	Potential To Emit (tons/year)
TOTAL	Negligible

(a) The potential to emit (as defined in 326 IAC 2-1.1-1(16)) of pollutants are less than 100 tons per year. Therefore, the source is not subject to the provisions of 326 IAC 2-7.

(b) The potential to emit (as defined in 326 IAC 2-1.1-1(16)) of VOC is greater than 25 tons per year, therefore, the source is subject to the provisions of 326 IAC 2-6.1.

(c) The potential to emit (as defined in 326 IAC 2-1.1-1(16)) of any single HAP is less than ten (10) tons per year and/or the potential to emit (as defined in 326 IAC 2-7-1(29)) of a combination of HAPs is less than twenty-five (25) tons per year, therefore, the source is not subject to the provisions of 326 IAC 2-7.

(d) Fugitive Emissions
Since this type of operation is not one of the twenty-eight (28) listed source categories under 326 IAC 2-2 and since there are no applicable New Source Performance Standards that were in effect on August 7, 1980, the fugitive particulate matter (PM) and volatile organic compound (VOC) emissions are not counted toward determination of PSD and Emission Offset applicability.

County Attainment Status

The source is located in Allen County.

Pollutant	Status
PM-10	Attainment
SO_2	Attainment
NO_2	Attainment
Ozone	Attainment
CO	Attainment
Lead	Attainment

(a) Volatile organic compounds (VOC) are precursors for the formation of ozone. Therefore, VOC emissions are considered when evaluating the rule applicability relating to the ozone standards. Allen County has been designated as attainment or unclassifiable for ozone. Therefore, VOC emissions were reviewed pursuant to the requirements for Prevention of Significant Deterioration (PSD), 326 IAC 2-2 and 40 CFR 52.21.

(b) Allen County has been classified as attainment or unclassifiable for all other criteria pollutants. Therefore, these emissions were reviewed pursuant to the requirements for Prevention of Significant Deterioration (PSD), 326 IAC 2-2 and 40 CFR 52.21.

(c) Fugitive Emissions
Since this type of operation is not one of the 28 listed source categories under 326 IAC 2-2, 40 CFR 52.21, or 326 IAC 2-3 and since there are no applicable New Source Performance Standards that were in effect on August 7, 1980, the fugitive particulate matter (PM) and volatile organic compound (VOC) emissions are not counted toward determination of PSD and Emission Offset applicability.

Source Status

Existing Source PSD Definition (emissions after controls, based on 8,760 hours of operation per year at rated capacity and/ or as otherwise limited):

Pollutant	Emissions (ton/yr)
PM	3.94
PM10	3.94
SO_2	0.04
VOC	67.1
CO	5.47
NO_x	6.51

This existing source is **not** a major stationary source because no attainment regulated pollutant is emitted at a rate of 250 tons per year or more, and it is not in one of the 28 listed source categories.

Part 70 Permit Determination

326 IAC 2-7 (Part 70 Permit Program)
This existing source is not subject to the Part 70 Permit requirements because the potential to emit (PTE) of:

(a) each criteria pollutant is less than 100 tons per year,

(b) a single hazardous air pollutant (HAP) is less than 10 tons per year, and

(c) any combination of HAPs is less than 25 tons/year.

Federal Rule Applicability

(a) There are no New Source Performance Standards (NSPS)(326 IAC 12 and 40 CFR Part 60) applicable to this source.

(b) The requirements of the New Source Performance Standard, 326 IAC 12, (40 CFR 60.40c-48c, Subpart Dc) are not applicable to these boilers because:

(1) The 4.2 MMBtu/hr boiler was constructed before the applicability date of June 9, 1989 and has a maximum heat input capacity of less than 10 MMBtu per hour.

(2) The 5.2 MMBtu/hr boiler was constructed after the applicability date of June 9, 1989 but has a maximum heat input capacity of less than 10 MMBtu per hour.

(c) The source does not perform any grain handling processes. Therefore, the requirements of the New Source Performance Standard for Grain Elevators (40 CFR 60.300-304, Subpart DD) are not applicable to this source.

(d) There are no National Emission Standards for Hazardous Air Pollutants (NESHAPs)(326 IAC 14 and 40 CFR Part 63) applicable to this source.

(e) The solvents applied to the closed top cold degreaser do not contain any halogenated HAP specified in 40 CFR 63.460. Therefore, the National Emission Standards for Hazardous Air Pollutants (NESHAPs) for Halogenated Solvent Cleaning (40 CFR Part 63, Subpart T) are not applicable to this source.

State Rule Applicability - Entire Source

326 IAC 2-2 (Prevention of Significant Deterioration (PSD))

This source is not 1 of 28 source categories defined in 326 IAC 2-2-1(p)(1) and was constructed before 1970. An exempt boiler was added in 2000. The potential to emit any regulated pollutant from the entire source is less than two hundred and fifty (250) tons per twelve (12) consecutive month period. Therefore, the requirements of 326 IAC 2-2 are not applicable.

326 IAC 2-4.1 (New Sources of Hazardous Air Pollutants)

This source was constructed prior to July 27, 1997 and the potential HAP emissions from the entire source are less than the major source thresholds. Therefore, the requirements of 326 IAC 2-4.1 are not applicable.

326 IAC 2-6 (Emission Reporting)

This source is located in Allen County and the potential to emit all criteria pollutants is less than one hundred (100) tons per year. Therefore, 326 IAC 2-6 does not apply.

326 IAC 5-1 (Opacity Limitations)

Pursuant to 326 IAC 5-1-2 (Opacity Limitations), except as provided in 326 IAC 5-1-3 (Temporary Alternative Opacity Limitations), opacity shall meet the following, unless otherwise stated in this permit:

(a) Opacity shall not exceed an average of forty percent (40%) any one (1) six (6) minute averaging period as determined in 326 IAC 5-1-4.

(b) Opacity shall not exceed sixty percent (60%) for more than a cumulative total of fifteen (15) minutes (sixty (60) readings) as measured according to 40 CFR 60, Appendix A, Method 9 or fifteen (15) one (1) minute nonoverlapping integrated averages for a continuous opacity monitor) in a six (6) hour period.

State Rule Applicability - The Baking Oven

326 IAC 8-1-6 (General Reduction Requirements for VOC Emissions)

The potential emissions of VOCs from the baking oven are greater than 25 tons per year. However, this oven was constructed before January 1, 1980, therefore, 326 IAC 8-1-6 does not apply.

326 IAC 8-6 (Organic Solvent Emission Limitations)

This source is located in Allen County and started operation before October 7, 1974. In addition, the potential VOC emissions from the entire source are less than 100 tons per year. Therefore, the requirements of 326 IAC 8-6 are not applicable.

326 IAC 6-3-2 (Process Operations)

The allowable particulate matter (PM) emission rate from the baking oven shall be limited to 9.94 lbs/hr when the process weight rate is 7,500 lbs/hr.

The pounds per hour limitation was calculated with the following equation:

Interpolation of the data for the process weight rate up to sixty thousand (60,000) pounds per hour shall be accomplished by use of the equation:

$E = 4.10\ P^{0.67}$ where E = rate of emission in pounds per hour and
P = process weight rate in tons per hour

According to the emission calculations (see Appendix A), the potential uncontrolled PM emissions from this oven are less than 9.94 lbs/hr, which is equivalent to 43.5 tons/yr. Therefore, this baking oven is in compliance with 326 IAC 6-3-2.

State Rule Applicability - Boilers

326 IAC 6-2-3 (PM Emissions for Sources of Indirect Heating)

The 4.2 MMBtu/hr boiler was constructed before 1972. Pursuant to 326 IAC 6-2-3, boilers existing and in operation before June 8, 1972 shall be limited by the following equation or by 0.8 lbs per MMBtu, whichever is more stringent:

$$Pt = \frac{C \times a \times h}{76.5 \times Q^{0.75} \times N^{0.25}}$$

Where

C = max ground level concentration (= 50 Fm/m^3)
Pt = emission rate limit (lbs/MMBtu)
Q = total source heat input capacity (MMBtu/hr)
N = number of stacks = 1
a = plume rise factor = 0.67
h = stack height (ft) = 35 ft

The emission rate limit calculated using the equation above is:

$$Pt = \frac{50 \times 0.67 \times 35}{76.5 \times 4.2^{0.75} \times 1^{0.25}} = 5.22 \text{ lbs/MMBtu}$$

Therefore, the most stringent PM emission limit for the 4.2 MMBtu/hr boiler is 0.8 lbs/MMBtu.

326 IAC 6-2-4 (PM Emissions for Sources of Indirect Heating)

The 5.2 MMBtur/hr boiler was constructed in 2000. Pursuant to 326 IAC 6-2-4(a), indirect heating facilities constructed after September 12, 1983, shall be limited by the following equation:

$$Pt = \frac{1.09}{Q^{0.26}}$$

Where

Pt = emission rate limit (lbs/MMBtu)
Q = total source heat input capacity (MMBtu/hr)

The emission rate limit calculated using the equation above is:

$$Pt = \frac{1.09}{(4.2 + 5.2)^{0.26}} = 0.61 \text{ lbs/MMBtu}$$

However, 326 IAC 6-2-4(a) also states that for Q less than 10 MMBtu per hour. The PM emissions shall not exceed 0.6 pounds per MMBtu. For this source, Q is equal to 9.4 MMBtu per hour (i.e., the summation of 4.2 MMBtu per hour and 5.2 MMBtu per hour). Therefore, the PM emissions from this 5.2 MMBtu/hr boiler shall not exceed 0.6 pounds per MMBtu.

State Rule Applicability - Three (3) Storage Silos

326 IAC 6-3-2 (Process Operations)

The allowable particulate matter (PM) emission rate from each storage silo shall be limited to 15.8 lbs/hr when the process weight rate is 7.5 ton/hr x 2000 lbs/ton = 15,000 lbs/hr.

The pounds per hour limitation was calculated using the following equation:

Interpolation of the data for the process weight rate up to sixty thousand (60,000) pounds per hour shall be accomplished by use of the equation:

$E = 4.10 P^{0.67}$ where E = rate of emission in pounds per hour and
P = process weight rate in tons per hour

According to the emission calculations (see Appendix A), the potential uncontrolled PM emissions from each silo are less than the limit above. Therefore, these storage silos are in compliance with 326 IAC 6-3-2.

State Rule Applicability - The Closed Top Cold Degreaser

326 IAC 8-3 (Organic Solvent Degreasing Operation)

This closed top cold degreaser was constructed before 1980 and the source is located in Allen County. Therefore, the requirements of 326 IAC 8-3 are not applicable.

326 IAC 8-6 (Organic Solvent Emission Limitations)

This source is located in Allen County and started operation before October 7, 1974. In addition, the potential VOC emissions from the entire source are less than 100 tons per year. Therefore, the requirements of 326 IAC 8-6 are not applicable.

Conclusion

The operation of this bread baking facility shall be subject to the conditions of the attached Minor Source Operating Permit 003-15594-00259.

Appendix A: Emission Calculations
Emissions
From 3.742 MMBtu/hr Bread Baking Oven

Company Name: Holsum of Fort Wayne, Inc.
Address City IN Zip: 136 Murray Street, Fort Wayne, IN 46803
MSOP: 003-15594-00259
Reviewer: ERG/YC
Date: June 22, 2002

1. VOC Emissions from Bread Baking:

Maximum Baking Rate: 7500 pounds bread per hour

According to AP-42, Chapter 9.9.6 - Bread Baking, the VOC emission factor from the bread baking process can be estimated with the following equation:

E.F. = 0.95 Yi + 0.195 ti - 0.51S - 0.86ts + 1.90

Where
E.F. = pounds VOC per ton of baked bread
Yi = initial backer's percent of yeast
ti = total yeast action time in hours
S = final (spike) baker's percent of yeast
ts = spiking time in hours

The percentage of yeast and rise time for each dough formula are confidential information. Based on the technical support document (TSD) for permit #003-6247-00259, issued on August 4, 1997, the VOC emission factors for worst case scenario is 4.06 lbs/tons.

Therefore, the potential uncontrolled VOC emissions from bread baking =

7500 lbs/hr 1 ton/2000 lbs x 4.06 lbs/ton x 8760 hrs/yr x 1 tons/2000 lbs = **66.7 tons/yr**

2. Emissions from Natural Gas Combustion:

Heat Input Capacity MMBtu/hr	Potential Throughput MMCF/yr
3.742	32.8

	Pollutant					
	PM*	PM10*	SO_2	**NO_x	VOC	CO
Emission Factor in lb/MMCF	7.6	7.6	0.6	100	5.5	84.0
Potential Emission in tons/yr	**0.12**	**0.12**	**9.8E-03**	**1.64**	**0.09**	**1.38**

*PM and PM10 emission factors are condensable and filterable PM10 combined.
**Emission Factors for NO_x: Uncontrolled = 100, Low NO_x Burner = 50, Low NO_x Burners/Flue gas recirculation = 32

Methodology

All Emission factors are based on normal firing.
MMBtu = 1,000,000 Btu
MMCF - 1,000,000 Cubic Feet of Gas

Potential Throughput (MMCF) = Heat Input Capacity (MMBtu/hr) x 8,760 hrs/yr x 1 MMCF/1,000 MMBtu
Emission Factors from AP-42, Chapter 1.4, Tables 1.4-1, 1.4-2, and 1.4-3, SCC #1-02-006-02, 1-01-006-02, 1-03-006-02, and 1-03-006-03 (AP-42 Supplement D 3/98)
Emission (tons/yr) = Throughput (MMCF/yr) x Emission Factor (lb/MMCF)/2,000 lb/ton

3. Total Uncontrolled Emissions from the Bread Baking Oven:

	Pollutant					
	PM	PM10	SO_2	NO_x	VOC	CO
Potential Emission in tons/yr	**0.12**	**0.12**	**9.8E-03**	**1.64**	**66.78**	**1.38**

Appendix A: Emission Calculations
Natural Gas Combustion
(MMBtu/hr < 100)
From 5.2 MMBtu/hr Boiler

Company Name: Holsum of Fort Wayne, Inc.
Address City IN Zip: 136 Murray Street, Fort Wayne, IN 46803
MSOP: 003-15594-00259
Reviewer: ERG/YC
Date: June 22, 2002

Heat Input Capacity MMBtu/hr	Potential Throughput MMCF/yr
5.2	45.6

	Pollutant					
	PM*	PM10*	SO_2	**NO_x	VOC	CO
Emission Factor in lb/MMCF	7.6	7.6	0.6	100	5.5	84.0
Potential Emission in tons/yr	**0.17**	**0.17**	**0.01**	**2.28**	**0.13**	**1.91**

*PM and PM10 emission factors are condensable and filterable PM10 combined.
**Emission Factors for NO_x: Uncontrolled = 100, Low NO_x Burner = 50, Low NO_x Burners/Flue gas recirculation = 32

Methodology

All Emission factors are based on normal firing.
MMBtu = 1,000,000 Btu
MMCF - 1,000,000 Cubic Feet of Gas

Potential Throughput (MMCF) = Heat Input Capacity (MMBtu/hr) x 8,760 hrs/yr x 1 MMCF/1,000 MMBtu
Emission Factors from AP-42, Chapter 1.4, Tables 1.4-1, 1.4-2, and 1.4-3, SCC #1-02-006-02, 1-01-006-02, 1-03-006-02, and 1-03-006-03 (AP-42 Supplement D 3/98)
Emission (tons/yr) = Throughput (MMCF/yr) x Emission Factor (lb/MMCF)/2,000 lb/ton

Appendix A: Emission Calculations
Natural Gas Combustion
(MMBtu/hr < 100)
From 4.2 MMBtu/hr Boiler

Company Name: Holsum of Fort Wayne, Inc.
Address City IN Zip: 136 Murray Street, Fort Wayne, IN 46803
MSOP: 003-15594-00259
Reviewer: ERG/YC
Date: June 22, 2002

Heat Input Capacity MMBtu/hr	Potential Throughput MMCF/yr
4.2	36.8

	Pollutant					
	PM*	PM10*	SO_2	**NO_x	VOC	CO
Emission Factor in lb/MMCF	7.6	7.6	0.6	100	5.5	84.0
Potential Emission in tons/yr	**0.14**	**0.14**	**0.01**	**1.84**	**0.10**	**1.55**

*PM and PM10 emission factors are condensable and filterable PM10 combined.
**Emission Factors for NO_x: Uncontrolled = 100, Low NO_x Burner = 50, Low NO_x Burners/Flue gas recirculation = 32

Methodology

All Emission factors are based on normal firing.
MMBtu = 1,000,000 Btu
MMCF - 1,000,000 Cubic Feet of Gas

Potential Throughput (MMCF) = Heat Input Capacity (MMBtu/hr) x 8,760 hrs/yr x 1 MMCF/1,000 MMBtu
Emission Factors from AP-42, Chapter 1.4, Tables 1.4-1, 1.4-2, and 1.4-3, SCC #1-02-006-02, 1-01-006-02, 1-03-006-02, and 1-03-006-03 (AP-42 Supplement D 3/98)
Emission (tons/yr) = Throughput (MMCF/yr) x Emission Factor (lb/MMCF)/2,000 lb/ton

Appendix A: Emission Calculations
PM/PM10 Emissions
From Three (3) Storage Silos

Company Name: Holsum of Fort Wayne, Inc.
Address City IN Zip: 136 Murray Street, Fort Wayne, IN 46803
MSOP: 003-15594-00259
Reviewer: ERG/YC
Date: June 22, 2002

1. Process Descriptions:

Silo Capacity:	**360,000**	**gal**
Max Throughput:	**7.5**	**tons/hr**
Control Device:	**filters**	
***PM/PM10 Emission Factor:**	**0.035**	**lbs/ton**

The flour is delivered via tank trucks and the silos are filled pneumatically. Two filter bags are installed at the top of each silo to equalize the pressure and to prevent the flour emitted to the atmosphere.

*Emission Factors are from AP-42, Tables 9.9.1-1, SCC #3-02-005-52 (Grain receiving by hopper truck, AP-42, 05/98)
, which is the emission factor for wheat loading. There is no emission factor for flour loading in AP-42.

2. Potential Uncontrolled PM/PM10 Emissions from Each Silo:

Hourly Potential PM/PM10 Emissions =	7.2 tons/hr x 0.035 lbs/ton =	**0.263 tons/yr/silo**
Annual Potential PM/PM10 Emissions =	0.263 tons/yr x 8760 hr/yr x 1 ton/2000 lbs =	**1.15 tons/yr/silo**

3. Potential Uncontrolled PM/PM10 Emissions from All Three Silos:

Total Potential PM/PM10 Emissions =	1.15 ton/yr/silo x 3 silos =	**3.45 tons/yr**

Appendix A: Emission Calculations
Natural Gas Combustion
(MMBtu/hr < 100)
From Space Heaters, Tube Heaters, and Furnaces

Company Name: Holsum of Fort Wayne, Inc.
Address City IN Zip: 136 Murray Street, Fort Wayne, IN 46803
MSOP: 003-15594-00259
Reviewer: ERG/YC
Date: June 22, 2002

Heat Input Capacity MMBtu/hr	Potential Throughput MMCF/yr
1.703	14.9

	Pollutant					
	PM*	PM10*	SO_2	**NO_x	VOC	CO
Emission Factor in lb/MMCF	7.6	7.6	0.6	100	5.5	84.0
Potential Emission in tons/yr	**0.06**	**0.06**	**4.5E-03**	**0.75**	**0.04**	**0.63**

*PM and PM10 emission factors are condensable and filterable PM10 combined.
**Emission Factors for NO_x: Uncontrolled = 100, Low NO_x Burner = 50, Low NO_x Burners/Flue gas recirculation = 32

Methodology

All Emission factors are based on normal firing.
MMBtu = 1,000,000 Btu
MMCF - 1,000,000 Cubic Feet of Gas

Potential Throughput (MMCF) = Heat Input Capacity (MMBtu/hr) x 8,760 hrs/yr x 1 MMCF/1,000 MMBtu
Emission Factors from AP-42, Chapter 1.4, Tables 1.4-1, 1.4-2, and 1.4-3, SCC #1-02-006-02, 1-01-006-02, 1-03-006-02, and 1-03-006-03 (AP-42 Supplement D 3/98)
Emission (tons/yr) = Throughput (MMCF/yr) x Emission Factor (lb/MMCF)/2,000 lb/ton